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*Lyft, Inc.*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

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11 THE STATE OF NEVADA, DEPARTMENT  
OF EMPLOYMENT TRAINING AND  
12 REHABILITATION, *ex. rel.* Chagolla

13 Plaintiff,

14 vs.

15 LYFT, INC.,

16 Defendants.

Case No.: 3:23-cv-00442-ART-CLB

**ORDER GRANTING STIPULATION  
TO EXTEND THE DEADLINE FOR  
THE PARTIES TO FILE A JOINT  
CASE MANAGEMENT REPORT**

**(FIRST REQUEST)**

17 Defendant Lyft, Inc. (“Defendant”), by and through its counsel, Jackson Lewis P.C., and  
18 Relator Christina Michelle Chagolla’s (“Relator”), by and through her counsel, Thierman Buck  
19 LLP, collectively “the Parties,” hereby stipulate and agree to extend the time for the Parties to file  
20 the Joint Case Management Report pursuant to the Court’s December 6, 2024 Order [ECF No. 47]  
21 by fourteen (14) days through and including February 4, 2025. This is the first request the Parties  
22 have stipulated to with respect to filing the Joint Case Management Report. As cause therefore, the  
23 Parties state as follows:

24 1. On December 13, 2023, Lyft moved to dismiss Relator’s First Amended Complaint  
25 pursuant to Federal Rules of Civil Procedure 12(b)(6) and 9(b). *See generally* ECF No. 22.

26 2. On September 30, 2024, the Court denied Defendant’s motion to dismiss in its  
27 entirety. ECF No. 36.  
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1           3.       Thereafter, on December 6, 2024, the Court issued an Order pursuant to Fed. R. Civ.  
2 P. 16 instructing the Parties to file a Joint Case Management Report by Tuesday, January 21, 2025.  
3 *See* ECF No. 47.

4           4.       Defendant has prepared and intends to file a Rule 54(b) motion for reconsideration  
5 of the Court’s September 30, 2024 Order or, in the alternative, to certify the questions of Nevada  
6 law presented in Lyft’s motion to dismiss to the Nevada Supreme Court pursuant to Rule 5 of the  
7 Nevada Rules of Appellate Procedure (the “Motion to Certify”).

8           5.       Defendant has informed Relator of its intention to file the Motion to Certify on or  
9 before Friday, January 24, 2025.

10          6.       Following Defendant’s filing of the Motion to Certify, the Parties intend to jointly  
11 request a stay of the proceedings, and the Court’s Joint Case Management Report requirement, until  
12 the Motion is resolved.

13          7.       This stipulation is not being made for purposes of delay but is made in good faith to  
14 permit Defendant to file the Motion to Certify and for the Court to resolve the same.

15          8.       No prejudice will result from this brief extension of time but, rather, will lead to the  
16 orderly and efficient use of the Parties’ and the Court’s resources.

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1 The Parties shall, therefore, have a fourteen-day extension up to and including February 4,  
2 2025, to file the Joint Case Management Report.

3 Dated this 21st day of January, 2025.

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5 THIERMAN BUCK LLP

JACKSON LEWIS P.C.

6 /s/ Joshua D. Buck

/s/ Joshua A. Sliker

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18  
19 **ORDER**

20 **IT IS SO ORDERED:**

21 Dated: January 22, 2025

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24 HON. CARLA BALDWIN  
25 UNITED STATES MAGISTRATE JUDGE  
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